

(Stipulating Parties Listed on Signature Pages)

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-01656 (SC) (N.D. Cal.); Case No. 11-cv-05502 SC; Case No. 11-cv-05513 SC; Case No. 11-cv-05514 SC

Stoebner, et al. v. LG Electronics, et al., No. 11-cv-05381 (SC) (N.D. Cal); Case No. 11-cv-00275 SC; Case No. 11-cv-06276 SC; Case No. 11-cv-06396 SC

Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502 (SC)) Case No. 11-cv-06397 SC
(N.D. Cal.);) Case No. 12-cv-02648 SC
) Case No. 12-cv-02649 SC

Best Buy Co., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513 (SC) (N.D.Cal.).

Target Corp., et al. v. Chunghwa Picture Tubes, Ltd.,
No. 11-cv-05514 (SC) (N.D. Cal.)
} STIPULATION AND [PROPOSED]
} ORDER

Interbond Corporation of America v. Hitachi, et al.,
No. 11-cv-06275 (SC) (N.D. Cal.);

Office Depot, Inc. v. Hitachi Ltd., et al., No. 11-cv-06276 (SC) (N.D. Cal.);

CompuCom Systems, Inc. v. Hitachi, Ltd., et al., No. 11-cv-06396 (SC) (N.D. Cal.);

Costco Wholesale Corp. v. Hitachi, Ltd., et al., No. 11-cv-06397 (SC) (N.D. Cal.)¹;

P.C. Richard and Son Long Island Corp., et al. v. Hitachi, Ltd., et al., No. 12-cv-02648 (SC) (N.D. Cal.);

¹ The *Costco Wholesale Corporation* complaint does not assert allegations against Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.), Panasonic Corporation of North America or MT Picture Display Co., Ltd.

Schultze Agency Services, LLC, et al. v. Hitachi, Ltd.,)
et al., No. 12-cv-02649 (SC) (N.D. Cal.))

It is hereby stipulated by and between the Direct Action Plaintiffs and the undersigned defendants (“Defendants”) in this action as follows:

WHEREAS, the Defendants intend to move to dismiss the Direct Action Plaintiffs' complaints;

WHEREAS, the parties believe that the interests of judicial efficiency will be served if they can agree on a briefing schedule for the above-mentioned motions to dismiss;

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the undersigned
Direct Action Plaintiffs and Defendants that:

1. The Defendants' motions to dismiss will be filed on or before August 17, 2012;
 2. The Direct Action Plaintiffs' opposition briefs will be filed on or before September 28, 2012;
 3. The Defendants' reply briefs will be filed on or before October 26, 2012;
 5. Opening and Opposition briefs addressing issues common to all Direct Action Plaintiffs will be subject to a limit of 40 pages; the reply briefs will be limited to 20 pages. Opening and Opposition briefs addressing issues specific to individual Direct Action Plaintiffs and/or Defendants will be subject to a limit of 15 pages; the reply briefs will be limited to 10 pages.

IT IS SO STIPULATED.

1 DATED: July 17, 2012

BOIES, SCHILLER & FLEXNER LLP

3 By: /s/ Philip J. Iovieno

4 PHILIP J. IOVIENO

5 **BOIES, SCHILLER & FLEXNER LLP**

10 North Pearl Street, 4th Floor

Albany, NY 12207

Telephone: (518) 434-0600

Facsimile: (518) 434-0665

Email: piovieno@bsflp.com

6
7
8
9
10
11
*Direct Action Plaintiff Liaison Counsel and Counsel
for Plaintiffs Electrograph Systems, Inc., Electrograph
Technologies, Corp., Office Depot, Inc., Compucom
Systems, Inc., Interbond Corporation of America, P.C.
Richard & Son Long Island Corporation, Marta
Cooperative of America, Inc., ABC Appliance, Inc.,
and Schultze Agency Services LLC on behalf of
Tweeter OpcO, LLC and Tweeter Newco, LLC*

12 DATED: July 17, 2012

13 SHEPPARD MULLIN RICHTER & HAMPTON

14 By: /s/ Gary L. Halling

15 GARY L. HALLING (SBN 66087)

16 E-mail: ghalling@sheppardmullin.com

17 JAMES L. MCGINNIS (SBN 95788)

18 E-mail: jmcmcinnis@sheppardmullin.com

19 MICHAEL W. SCARBOROUGH, (SBN 203524)

E-mail: mscarborough@sheppardmullin.com

20 **SHEPPARD MULLIN RICHTER & HAMPTON**

21 Four Embarcadero Center, 17th Floor

22 San Francisco, California 94111

23 Telephone: (415) 434-9100

24 Facsimile: (415) 434-3947

25
26
27
28
*Attorneys for Defendants Samsung SDI America, Inc.;
Samsung SDI Co., Ltd.; Samsung SDI (Malaysia) SDN.
BHD.; Samsung SDI Mexico S.A. DE C.V.; Samsung SDI
Brasil Ltda.; Shenzhen Samsung SDI Co., Ltd. and Tianjin
Samsung SDI Co., Ltd.*

1 WINSTON & STRAWN LLP
2

3 By: /s/ Jeffrey L. Kessler
4 JEFFREY L. KESSLER (pro hac vice)
5 E:mail: JKessler@winston.com
6 A. PAUL VICTOR (pro hac vice)
7 E:mail: PVictor@winston.com
8 EVA COLE (pro hac vice)
9 E:mail: EWCole@winston.com
10 MOLLY M. DONOVAN
11 E:mail: MMDonovan@winston.com
12 **WINSTON & STRAWN LLP**
13 200 Park Avenue
14 New York, NY 10166
Telephone: (212) 294-6700

15 STEVEN A. REISS (pro hac vice)
16 E-mail: steven.reiss@weil.com
17 DAVID L. YOHAI (pro hac vice)
18 E-mail: david.yohai@weil.com
19 ADAM C. HEMLOCK (pro hac vice)
20 E-mail: adam.hemlock@weil.com
21 **WEIL, GOTSHAL & MANGES LLP**
22 767 Fifth Avenue
23 New York, New York 10153-0119
24 Telephone: (212) 310-8000
Facsimile: (212) 310-8007

25 *Attorneys for Defendants Panasonic Corporation (f/k/a*
26 *Matsushita Electric Industrial Co., Ltd.), Panasonic*
27 *Corporation of North America, MT Picture Display Co.,*
28 *Ltd.*

18 MORGAN, LEWIS & BOCKIUS LLP

19 By: /s/ Kent M. Roger
20 KENT M. ROGER (SBN 95987)
21 E-mail: kroger@morganlewis.com
22 MICHELLE PARK CHIU (SBN 248421)
23 E-mail: mchiu@morganlewis.com
24 **MORGAN, LEWIS & BOCKIUS LLP**
25 One Market, Spear Street Tower
26 San Francisco, California 94105-1126
27 Telephone: (415) 442-1000
28 Facsimile: (415) 442-1001

1 J. CLAYTON EVERETT, JR. (pro hac vice)
2 E-mail: jeverett@morganlewis.com
3 SCOTT A. STEMPPEL (pro hac vice)
4 E-mail: sstempel@morganlewis.com
5 **MORGAN, LEWIS & BOCKIUS LLP**
6 111 Pennsylvania Avenue, NW
7 Washington, DC 20004
8 Telephone: (202) 739-3000
9 Facsimile: (202) 739-3001

10 *Attorneys for Defendants Hitachi, Ltd., Hitachi Displays,*
11 *Ltd., Hitachi Asia, Ltd., Hitachi America, Ltd., and*
12 *Hitachi Electronic Devices (USA), Inc.*

13 ARNOLD & PORTER LLP

14 By: /s/ Sharon D. Mayo
15 SHARON D. MAYO (SBN 150469)
16 sharon.mayo@aporter.com
17 Three Embarcadero Center, 7th Floor
18 San Francisco, California 94111-4024
19 Telephone: (415) 471-3100
20 Facsimile: (415) 471-3400

21 DOUGLAS L. WALD (*Pro Hac Vice*)
22 douglas.wald@aporter.com
23 WILSON D. MUDGE (*Pro Hac Vice*)
24 wilson.mudge@aporter.com
25 YONGSANG KIM (*Pro Hac Vice*)
26 yongsang.kim@aporter.com
27 **ARNOLD & PORTER LLP**
28 555 Twelfth Street, NW
Washington, DC 20004
Telephone: (202) 942-5000
Facsimile: (202) 942-5999

29 *Attorneys for Defendants LG Electronics, Inc. and LG*
30 *Electronics USA, Inc.*

31 O'MELVENY & MYERS LLP

32 By: /s/ Ian Simmons
33 IAN SIMMONS (pro hac vice)
Email: isimmons@omm.com
34 BEN BRADSHAW (SBN 189925)
Email: bbradshaw@omm.com
35 **O'MELVENY & MYERS LLP**
36 1625 Eye Street, NW
37 Washington, DC 20006
38 Telephone: (202) 383-5300
39 Facsimile: (202) 383-5414

40 *Attorneys for Defendants Samsung Electronics Co., Ltd.*
41 *and Samsung Electronics America, Inc.*

WHITE & CASE LLP

By:/s/ *Christopher M. Curran*
CHRISTOPHER M. CURRAN (pro hac vice)
E-mail: ccurran@whitecase.com
GEORGE L. PAUL (pro hac vice)
E-mail: gpaul@whitecase.com
LUCIUS B. LAU (pro hac vice)
E-mail: alau@whitecase.com
WHITE & CASE LLP
701 Thirteenth Street, N.W.
Washington, DC 20005
Telephone: (202) 626-3600
Facsimile: (202) 639-9355

Attorneys for Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Information Systems, Inc., Toshiba America Consumer Products, L.L.C., and Toshiba America Electronic Components, Inc.

GIBSON, DUNN & CRUTCHER LLP

By:/s/ *Joel S. Sanders*
JOEL S. SANDERS, SBN 107234
E-mail: JSanders@gibsondunn.com
RACHEL S. BRASS, SBN 219301,
E-mail: Rbrass@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, California 94105-2933
Telephone: (415) 393-8200
Facsimile: (415) 393-8306

Attorneys for Defendant Tatung Company of America, Inc.

BAKER BOTTS LLP

By: /s/ Jon V. Swenson
Jon V. Swenson (SBN 233054)
BAKER BOTTS LLP
620 Hansen Way
Palo Alto, CA 94304
Telephone: (650) 739-7500
Facsimile: (650) 739-7699
Email: jon.swenson@bakerrbotts.com

John M. Taladay (*pro hac vice*)
Joseph Ostoyich (*pro hac vice*)
BAKER BOTTS LLP
1299 Pennsylvania Ave., N.W.
Washington, DC 20004-2400
Telephone: (202) 639-7700
Facsimile: (202) 639-7890
Email: john.taladay@bakerbotts.com
Email: joseph.ostoyich@bakerbotts.com

*Attorneys for Philips Electronics North America
Corporation and Koninklijke Philips Electronics N.V.*

Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this document has been obtained from each of the above signatories.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Samuel Conti